



FirstEnergy Nuclear Operating Company

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10CFR50.55a

Docket Number: 50-346

License Number NPF-3

Serial Number 2809

September 23, 2002

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: 10 CFR 50.55a Requests for Alternatives Pursuant to American Society of Mechanical Engineers Boiler and Pressure Vessel Code Requirements at the Davis-Besse Nuclear Power Station – Third Ten-Year Interval Inservice Inspection Program (RR-A26 and RR-A27)

Ladies and Gentlemen:

By letter Serial Number 2797, dated August 1, 2002, the FirstEnergy Nuclear Operating Company (FENOC) submitted two requests pursuant to 10 CFR 50.55a for NRC approval of alternatives to certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) that are applicable to the Davis-Besse Nuclear Power Station, Unit 1 (DBNPS). The first request, designated RR-A26, proposed an alternative to the ASME Code record requirements for the replacement Reactor Vessel Closure Head (RVCH) construction radiography film and accompanying review forms. The second request, designated RR-A27, proposed an alternative to the ASME Code construction record requirements for the radiographic examination of the replacement RVCH Head-to-Flange Weld.

On September 13, 2002, a telephone conference call was held between the NRC staff and DBNPS staff in order to clarify information contained in requests RR-A26 and RR-A27 regarding the proposed alternatives. As a result of this call, FENOC is providing the following to clarify these two proposed alternatives.

Regarding request RR-A26, FENOC proposes, as an alternative to the ASME Code construction record requirements, to use the original Code Data Form showing the construction activities performed, and the supplemental radiographic examination performed and its associated records obtained in 2002 of the replacement RVCH Head-

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to-Flange Weld (WH-7) and the 69 Control Rod Drive Mechanism Nozzle Body-to-Flange Welds (WH-9), as the records to be maintained as required by the ASME Code.

Regarding request RR-A27, FENOC proposes, as an alternative to the ASME Code construction record requirements for a full radiograph of the RVCH Head-to-Flange Weld (WH-7), to use the Manufacturer's Data Report for Nuclear Vessels - Form N-1A (Code Data Form) that states the RVCH conforms to the ASME Code requirements, and the supplemental radiographic examination records obtained in 2002 that examined approximately 95% of the replacement RVCH Head-to-Flange Weld to satisfy the ASME Code requirements.

Should you have any questions or require additional information, please contact Mr. Patrick J. McCloskey, Manager-Regulatory Affairs, at (419) 321-8450.

Very truly yours,



DRW/s

cc: J. E. Dyer, Regional Administrator, NRC Region III
J. B. Hopkins, DB-1 NRC/NRR Senior Project Manager
C. S. Thomas, DB-1 Senior Resident Inspector
Utility Radiological Safety Board

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COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station (DBNPS) in this document. Any other actions discussed in the submittal represent intended or planned actions by the DBNPS. They are described only for information and are not regulatory commitments. Please notify the Manager - Regulatory Affairs (419-321-8450) at the DBNPS of any questions regarding this document or associated regulatory commitments.

COMMITMENTS

DUE DATE

None